

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA**

**v.**

**EDWARD J. ABELL, III,**

**Defendant.**

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**Criminal No.: 17-10332-NMG**

**JOINT INITIAL STATUS REPORT**

Pursuant to Local Rule 116.5(a), the parties hereby file the following initial status report prepared in connection with the initial status conference scheduled for December 19, 2017:

(1) Automatic Discovery/Pending Discovery Requests

The government provided automatic discovery to the Defendant on December 13, 2017.

(2) Additional Discovery

The government anticipates providing additional discovery in the next week, which will consist of additional financial records and forensic images of devices seized during the search of the Defendant's home. The government also expects to receive additional records in the next 30 days. Once received, these will provide to the Defendant immediately.

(3) Timing of Additional Discovery Requests

The Defendant is reviewing the discovery provided by the government and the parties expect additional discovery to be produced in the next 30 days. Accordingly, it is premature to decide what, if any, discovery requests will be made.

(4) Protective Orders

Currently, protective orders are not anticipated by the parties. Should that change, the parties will address those issues promptly.

(5) Pretrial Motions

It is premature to decide whether the Defendant will file any pretrial motions under Fed. R. Crim. P. 12(b).

(6) Expert Discovery

The government agrees to provide any expert witness disclosures 30 days prior to trial. The Defendant agrees to provide any expert witness disclosures 21 days prior to trial.

(7) Speedy Trial Act

All of the time has been excluded between the Defendant's arraignments on November 7, 2017 through the date of the initial status conference on December 19, 2017. [Dkt. # 37].

(8) Interim Status Conference

The parties respectfully request that the Court schedule an Interim Status Conference to occur in approximately 45 days from the Initial Status Conference, or as soon thereafter as is convenient for the Court and ask that the time between the Initial Status Conference and the Interim Status Conference be excluded from all Speedy Trial calculations.

Respectfully submitted,

WILLIAM D. WEINREB  
Acting United States Attorney

Date: December 13, 2017

By: /s/ Jordi de Llano  
Jordi de Llano  
Assistant United States Attorney

Date: December 13, 2017

By: /s/ Peter Charles Horstmann  
Peter Charles Horstmann  
BBO#556377  
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Newton, MA 02466  
Counsel for Edward J. Abell, III

**CERTIFICATE OF SERVICE**

I, Jordi de Llano, hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: December 13, 2017

/s/ Jordi de Llano  
Assistant United States Attorney